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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

JAN 26 1998

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of)
) CC Docket No. 95-116
Telephone Number Portability)

To: Chief, Wireless Telecommunications Bureau

**REPLY COMMENTS OF CENTURY CELLUNET, INC. REGARDING
CTIA PETITION FOR EXTENSION OF IMPLEMENTATION DEADLINE**

Century Cellunet, Inc. ("Century")¹ hereby submits its reply to comments on the Petition by the Cellular Telecommunications Industry Association ("CTIA") in the above-captioned proceeding. Specifically, CTIA's Petition requests an extension, from June 30, 1999 until March 31, 2000, of the implementation deadline for service provider number portability by wireless carriers. As detailed below, Century joins the majority of commenters in supporting CTIA's requested extension.

The efforts to develop the necessary standards for wireless number portability have resulted in substantial progress to date and highlighted the many challenging issues that remain on the table. As recounted by CTIA and echoed by many of the commenters, among the most difficult of the issues to be resolved before final standards can be adopted is separating the current Mobile Identification Number ("MIN") from the Mobile Directory Number

¹ Century operates numerous cellular systems throughout the United States. Its affiliate, Century Personal Access Network, Inc., is in the process of building out broadband PCS systems in Michigan and Mississippi. Century Cellunet, Inc. and Century Personal Access Network, Inc. are both subsidiaries of Century Telephone Enterprises, Inc.

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("MDN").² Rendering these two numbers distinct is essential in order that number portability can be implemented consistently with nationwide roaming objectives. Yet, doing so requires that the current wireless call structure be completely reconfigured and that numerous associated technical issues be resolved. As pointed out by several commenters, the resolution of these issues and the adoption of final standards is unlikely to occur until much later this year.³

Further, the mere adoption of final standards for service provider number portability will not permit immediate implementation. The reconfiguration of existing wireless systems to separate the MIN and MDN will require substantial modification to current CMRS equipment, including intricate customer service, sales and billing systems. It will also require the substantial reworking of related technical capabilities, such as automatic roaming and E911 callback.⁴ Century, accordingly, joins CTIA and other commenters in underscoring that the design, manufacture, testing, and large-scale installation of equipment that meets these final

² See CTIA Petition, CC Docket No. 95-116, at 2-3, 6-7 (filed Nov. 24, 1997); Comments of Airtouch Communications, Inc., CC Docket No. 95-116, at 2 (filed Jan. 9, 1998) ("Comments of Airtouch"); Comments of GTE Service Corporation, CC Docket No. 95-116, at 2-3 ("Comments of GTE"); Comments of PrimeCo Personal Communications, L.P., CC Docket No. 95-116, at 3 (filed Jan. 9, 1998) ("Comments of PrimeCo"); Comments of Southwestern Bell Mobile Systems, Inc. and Pacific Bell Mobile Services, CC Docket No. 95-116, at 1-2 (filed Jan. 9, 1998); Comments of United States Cellular Corporation, CC Docket No. 95-116, at 2 (filed Jan. 9, 1998); Comments of 360° Communications Company, CC Docket No. 95-116, at 2 (filed Jan. 9, 1998) ("Comments of 360°").

³ See Comments of Airtouch at 2; Comments of GTE at 5-6; Comments of PrimeCo at 2; Comments of 360° at 2-3.

⁴ See Comments of AT&T Wireless Services, Inc., CC Docket No. 95-116, at 4-5 (filed Jan. 9, 1998); Comments of GTE at 3-4; Comments of Sprint Spectrum L.P. d/b/a Sprint PCS, CC Docket No. 95-116, at 2 (filed Jan. 9, 1998).

standards will necessarily take a substantial amount of time. Airtouch appropriately emphasizes that such equipment will need to be installed in “all switches operated by all CMRS providers (large and small)” in order to ensure continued ubiquitous roaming capabilities for customers.⁵ As noted by CTIA, “[i]n a large distributed network environment it can take up to 24 months to integrate new applications from the planning through roll-out phases.”⁶ Thus, even assuming an accelerated manufacturing and testing schedule, it is extremely unlikely that full implementation can be accomplished by the current June 30, 1999, implementation date.⁷

When adopting the current implementation schedule for wireless number portability, the Commission expressly anticipated that wireless carriers might encounter these kinds of unforeseen and highly complex technical impediments. For this reason, the Commission in its *First Report and Order* specifically granted the Wireless Telecommunications Bureau authority to extend the implementation deadline for up to nine months “to ensure the efficient development of number portability.”⁸ The record in this proceeding clearly provides sufficient

⁵ Comments of Airtouch at 4; *see also* Comments of PrimeCo at 3.

⁶ CTIA Petition, Appendix (Declaration of Arthur L. Prest) at 5; *see also* Comments of GTE at 6; Comments of PrimeCo at 3.

⁷ Omnipoint Communications, Inc. (“Omnipoint”) states that the GSM standard used in its systems is currently capable of supporting wireless number portability and, thus, no extension is necessary. Comments of Omnipoint, CC Docket No. 95-116, at 1-3 (filed Jan. 9, 1998). Nevertheless, the vast majority of CMRS systems do not use that technology and thus require additional time for the development of standards and manufacture of equipment to enable them to comply with number portability requirements.

⁸ *First Report and Order and Further Notice of Proposed Rulemaking, Telephone Number Portability*, 11 FCC Rcd 8352, 8440-41 (1996). The Commission reiterated this grant of extension authority on reconsideration. *First Memorandum Opinion and Order on*

(Continued...)

basis for such an extension. Contrary to the assertions of WorldCom, Inc. ("WorldCom") and MCI Telecommunications Corporation ("MCI"),⁹ CTIA and many of the commenters have specifically identified and described the remaining standards issues to be resolved, the time it will likely take to do so, and the period necessary for design, testing and installation of equipment. As these parties make clear, the current deadline simply cannot be met.

Accordingly, Century is in accord with the majority of commenters in supporting CTIA's request to extend until March 31, 2000, the deadline for implementation of service provider number portability by wireless carriers. The record fully justifies the need for this

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Reconsideration, Telephone Number Portability, 12 FCC Rcd 7236, 7312 (1997).

⁹ Comments of WorldCom, CC Docket No. 95-116, at 4-5 (filed Jan. 9, 1998); Comments of MCI, CC Docket No. 95-116, at 1-4 (filed Jan. 9, 1998). MCI is clearly confused in arguing that the requested nine-month extension must meet the five-pronged showing for carrier-specific waivers. Comments of MCI at 5-6. As is plain from the text of the *First Report and Order*, such a showing applies only to requests by a particular carrier for a waiver of the implementation deadline as applied only to that carrier. See *First Report and Order*, 11 FCC Rcd at 8440-41. An extension of the overall implementation date for all wireless carriers, such as CTIA requests here, is clearly not subject to such carrier-specific demonstrations, but rather a general public interest showing.

extension. Such an extension is also fully consistent with the implementation flexibility expressly granted by the Commission in its *First Report and Order* in this proceeding.

Respectfully submitted,

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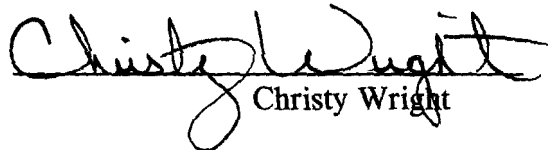
CERTIFICATE OF SERVICE

I hereby certify that on this 26th day of January, 1998, I caused copies of the foregoing Reply Comments of Century Cellunet, Inc. to be mailed via first-class postage prepaid mail to the following:

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